

Biser, Trustees for the Benefit of Creditors; Heirs, Successors and/or Assigns of Frederick Merten, Charles A. Rice, and Thomas B. Biser, Trustees for the Benefit of Creditors; Creditors of James P. Biser; Heirs, Successors and/or Assigns of the Creditors of James P. Biser, James P. Biser, Heirs, Successors, and Assigns of James P. Biser. The Bill of Complaint to Quiet Title alleges in substance as follows:

FIRST: That Complainants are the owners as tenants by the entireties in fee simple of property located in the Petersville Election District, Frederick County, Maryland, described as Lots 8, 9, and 10 of the Rhodes Addition to Knoxville, by reason of a deed from Archie T. Shafer and Emma R. Shafer, his wife, said deed dated August 30, 1972, and recorded among the Land Records of Frederick County, Maryland, in Liber 888, folio 158, and copy of said deed is attached hereto and labeled Exhibit I and prayed to be incorporated in the Bill of Complaint.

SECOND: That Julia M. Shafer, a predecessor in title to Lot 8 Rhodes Addition to Knoxville a part of the property above described by deed dated February 28, 1944 and recorded in Liber 441, folio 372, did present a claim of actual visible continuance adverse, hostile, and uninterrupted possession of the said parcel, by her predecessors in interest Thomas K. Shafer and Lizzie M. Shafer from approximately 1905-1906 and by herself from 1906-1944, a copy of said deed is hereto attached and labeled Exhibit II and is prayed to be incorporated in this Bill of Complaint, and further that a record chain of title exists from said Julia M. Shafer to Archie T. Shafer and Emma R. Shafer, his wife, grantors of your Complainants.

THIRD: That on the 27th day of August, 1881, Philip Porter and Mary J. Porter, his wife, did convey be deed recorded in Liber A.F. 3, folio 708, of the Land Records of Frederick County, Maryland, all their right, title and interest in Lot 8 the Rhdoes Addition to Knoxville unto James P. Biser, copy of said deed attached hereto and marked Exhibit III and prayed to be incorporated herein.